

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454-GKF-jfj
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

**PLAINTIFF’S MOTION TO SEAL ITS SUPPLEMENTAL BRIEF IN SUPPORT OF ITS
MOTION FOR LEAVE TO FILE AMENDED COMPLAINT AND SUPPORTING
DECLARATION**

Pursuant to Local Rule 79.1, the Court’s General Order In Re The Use of Confidential Information In Civil Cases (“GO 08-11”), and paragraph 2(f) of the Stipulated Protective Order (Dkt. No. 55), Plaintiff Video Gaming Technologies, Inc., hereby requests that the Court enter an order to seal Plaintiff’s unredacted Supplemental Brief in Support of Its Motion for Leave to File Amended Complaint (“Brief”), and Exhibits T, U and V to the Declaration of Michael S. Sawyer in Support of Plaintiff’s Supplemental Brief (“Declaration”) (collectively, Dkt. No. 97). In support of this motion, Plaintiff states the following:

1. Portions of the Brief contain quotes from documents Defendants have designated as containing sensitive and/or proprietary trade secret information, which, pursuant to paragraph 1(d) of the Stipulated Protective Order (Dkt. No. 55), should be treated as Highly Confidential Information.

2. Exhibits T, U and V to the Declaration contain documents Defendants have designated as containing sensitive and/or proprietary trade secret information, which, pursuant to paragraph 1(d) of the Stipulated Protective Order (Dkt. No. 55), should be treated as Highly Confidential Information.

3. In accordance with Local Rule 79.1, GO 08-11, and the Stipulated Protective Order, Plaintiff has filed both public, redacted versions of the Brief and Declaration, *see* Dkt. No. 96, and sealed, unredacted versions of the Brief and Declaration, *see* Dkt. No. 97.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order sealing the unredacted Brief and Declaration (Dkt. No. 97).

Dated: July 10, 2018

Respectfully submitted,

/s/ Gary M. Rubman

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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2018, I filed the foregoing via CM/ECF, which caused the foregoing to be served on the following counsel for Defendants:

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